

National Aeronautics and Space Administration  
Kennedy Space Center  
Kennedy Space Center, FL 32899



April 23, 2013

CC-A

Reply to Attn of:

TO: All NASA Civil Servants

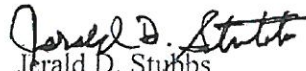
FROM: CC/Chief Counsel

SUBJECT: Reception Onboard the Nao Victoria Galleon 16<sup>th</sup> Century Replica Ship  
May 10, 2013

The National Air, Sea, & Space Foundation, a non-profit organization under 501(c)(3) of the Internal Revenue Code, will host a reception onboard the Nao Victoria Galleon 16<sup>th</sup> Century Replica Ship in the Cove at Port Canaveral, Florida, on Friday, May 10, 2013. Approximately 150 people are expected to attend the event. These guests include corporate executives, representatives of aerospace contractors and other organizations, local business, community, and military leaders, and representatives of local, state, Federal, and foreign governments. The approximate value of the dinner is \$125 per person.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in attendance at this event. The dinner will provide employees the opportunity to demonstrate NASA's support of the Future Explorers Education Program and Aerospace Career Day, a program which recognizes noteworthy space-related efforts in Florida. In addition, this event is a forum for employees to discuss matters of interest to NASA, including the NASA Education Program and careers in aerospace, with a diverse group of fellow attendees interested in our activities. It is in the Government's best interest for employees to attend the reception as representatives of NASA. Accordingly, NASA employees whose duties do not substantially affect the sponsor, including those employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge, may accept an invitation for complimentary attendance at the event.

NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office.

  
Gerald D. Stubbs  
Agency Designee